

**WSI****Weston Services, Inc.**

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2 April 1991

Mr. Edgar G. Kaup, P.E.
Case Manager
Bureau of Federal Case Management
Division of Hazardous Waste Management
New Jersey Department of Environmental Protection
5th Floor
401 East State Street
Trenton, New Jersey 08625-0029

RE: L.E. CARPENTER AND COMPANY SUPPLEMENTAL REMEDIAL
INVESTIGATION COMMENTS DATED 13 MARCH 1991

Dear Mr. Kaup:

On behalf of our client, L.E. Carpenter and Company (L.E. Carpenter), Weston Services, Inc. (WSI) has prepared the following responses to the NJDEP's comments on the Supplemental Remedial Investigation (RI) Report dated November 1990. These comments are in direct response to NJDEP's letter of 13 March 1991, and are presented in the same order as the technical coordinator's comments.

- (1) WESTON has evaluated the issue of off-site groundwater usage and potential impacts. A summary report of our findings will be transmitted by 8 April. This information has been incorporated into the draft Feasibility Study and will be inserted into the revised Risk Assessment.
- (2) The NJDEP suggests that to determine the extent of groundwater contamination on the Air Products' property, an additional monitoring well must be installed northeast of MW-13s. WESTON believes that existing monitoring wells MW-13s and MW-13i have defined the extent of groundwater contamination on Air Products' property as it relates to L.E. Carpenter. All compounds were detected at levels below final, proposed, or Phase II maximum contaminant levels (MCLs) with the exception of trichloroethylene (TCE) and methylene chloride in one sample. TCE was detected in the first sample collected from MW-13s at 5.2 ug/l and in the second sample at 4.4 ug/l. These values are close to the MCL (final) of 5 ug/l for TCE and should define the extent of any TCE contamination. However, TCE has not been detected in any other RI groundwater

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samples collected on L.E. Carpenter property, which makes it doubtful that L.E. Carpenter is the source. Methylene chloride was detected in the first samples from MW-13s and MW-13i and was also found in the laboratory method blank. The subsequent samples from MW-13s and MW-13i, however, did not detect methylene chloride at a detection limit of 5 ug/l. In addition, key compounds found in relatively high concentrations on-site such as ethylbenzene, xylene, and bis-2-ethylhexyl(phthalate), are not detected above detection limits in samples from MW-13s and MW-13i. Based on this information, WESTON does not believe an additional monitoring well is needed on Air Products' property to define the extent of groundwater contamination. However, L.E. Carpenter will collect an additional round of samples from MW-13s and MW-13i in order to confirm the previous groundwater data. This effort is subject to successfully gaining site access.

- (3) One additional groundwater monitoring well will be installed and sampled on the Wharton Enterprises' property contingent upon gaining access to the property.
- (4) A sediment sampling program is currently being evaluated. The geology of the area does not allow for a successful collection of discrete subsurface sediment samples. The extensive fill and obvious "boulder" layer prevents use of conventional sediment sampling devices. Prior to initiating additional sediment sampling efforts, WSI proposes that L.E. Carpenter and NJDEP further discuss the objective of such sampling.

If you have any questions regarding these responses, please contact me at (908) 225-3990. I will call you on 8 April to discuss these responses.

Very truly yours,

WESTON SERVICES, INC.

David Henderson

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